

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-v-

Case No: 24-cr-20562
Hon. Brandy R. McMillion

SHAWN PATRICK SMITH,

Defendant,

/

Notice Regarding Expert Witness Testimony

The government hereby files this notice regarding potential expert witness opinion testimony pursuant to Fed. R. Crim. P. 16(a)(1)(G).

It is anticipated that Rhonda Pozehl will testify as an expert witness at trial. Ms. Pozehl is a practicing attorney who, since September 2021, has operated her own boutique law firm where she concentrates on professional responsibility and ethics matters. Ms. Pozehl worked at the Attorney Grievance Commission of Michigan as an associate counsel from January 1987 through March 1997 and as a supervising senior associate counsel from January 2004 through April 2021. While at the Attorney Grievance Commission of Michigan, Ms. Pozehl investigated and prosecuted attorney disciplinary matters, among other duties. She is the author of five published legal articles and has made dozens of presentations concerning attorney ethics. She has not

testified as an expert witness during the last four years. A copy of Ms. Pozehl's resume is attached as Appendix A.

The government anticipates that Ms. Pozehl will testify at trial concerning the proper manner for an attorney to handle settlements, payments from third parties, and earned and unearned fees from clients. A list of the opinions that Ms. Pozehl will testify to at trial and the bases and reasons for her opinions is attached at Appendix B.

Respectfully submitted,

DAVID A. HUBBERT
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By: /s/ Jeffrey A. McLellan
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Dated: January 16, 2025

CERTIFICATE OF SERVICE

I certify that on January 16, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which thereby forwarded the filing by electronic means to counsel for the Defendant.

/s/ Jeffrey McLellan